

Analysis of Responses to our Consultation 'After the QCF: A New Qualifications Framework'



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Contents

Executive summary	2
Introduction.....	3
Background	3
About the consultation	3
Who responded?	4
Consultation analysis.....	5
Question 1	5
Question 2.....	6
Question 3.....	8
Question 4.....	9
Question 5.....	10
Question 6.....	11
Question 7.....	12
Question 8.....	14
Question 9.....	14
Question 10.....	16
Question 11.....	16
Question 12.....	17
Question 13.....	18
Question 14.....	20
Question 15.....	21
Question 16.....	22
Question 17.....	22
Question 18.....	23
Question 19.....	24
Appendix A: List of respondents to the consultation	26

Executive summary

Our consultation, 'After the QCF: A New Qualifications Framework', about the rules and guidance we need to put in place when we withdraw the rules for the Qualifications and Credit Framework (QCF) took place between 25th March 2015 and 17th June 2015.

The consultation questions were available either to complete online or to download. A copy of the consultation is available on our website.¹

We received 119 responses to the consultation. Fifteen responses came from individuals expressing personal views and 104 were official responses from organisations or groups.

Respondents broadly supported our proposals for a new qualifications framework and the rules and guidance we proposed to put in place to support it. These rules will enable us to introduce a new descriptive framework and effectively regulate awarding organisations in their use of the framework once the QCF rules are withdrawn.

Although the overall response to the consultation was markedly positive, there were areas where opinion diverged, notably our proposals to remove autonomy and accountability as level descriptors and our proposals and draft criteria and guidance on Total Qualification Time. Having considered this feedback, we have changed our policy in some areas. These changes are detailed in the accompanying document *After the QCF: New Qualifications Framework – Decisions on Conditions and Guidance for the Regulated Qualifications Framework (RQF)*.²

¹ www.gov.uk/government/uploads/system/uploads/attachment_data/file/425193/2015-03-25-after-the-qcf-a-new-qualifications-framework.pdf

² www.gov.uk/government/consultations/after-the-qcf-a-new-qualifications-framework

Introduction

This report provides an analysis of the main views expressed by those who responded to our consultation, 'After the QCF: A New Qualification Framework', which proposed how we would manage the withdrawal of QCF rules and set out the new Conditions, guidance and criteria we proposed to put in place instead.

Background

In 2008 the QCF was launched by the relevant government departments in England, Northern Ireland and Wales, as part of a UK-wide vocational qualifications reform programme. The QCF included a number of design rules that awarding organisations offering vocational qualifications were encouraged to meet in order to comply with qualifications funding requirements.

In 2011 we issued our General Conditions of Recognition.³ They set out the requirements that the awarding organisations we regulate must meet. Our General Conditions apply to all recognised awarding organisations and their regulated qualifications. In 2011, we used our powers under Conditions B7 and D5 to require awarding organisations which offered particular qualifications to adhere to certain paragraphs of the QCF rules.

Last year we reviewed how the QCF rules were working and found that they did not, in all cases, support the design of good qualifications. We published our findings and, following consultation,⁴ we announced our decision to remove the QCF rules.

About the consultation

Section 2 of the consultation 'After the QCF: A New Qualification Framework', set out what we aimed to achieve and the proposed timeline for the changes. In sections 3 and 4, we outlined our equality analysis and our assessment of the regulatory impacts of our proposals. Finally, in section 5 we set out the draft Conditions, criteria and guidance on which we were seeking views. A considerable amount of the section addressed draft Conditions, guidance and criteria that related to the description of a qualification's size.

Our consultation proposed rules to enable us to introduce a descriptive qualifications framework which would not impose qualification design rules and which would encompass all of the qualifications that we regulate. The key requirements of the new

³ www.gov.uk/government/publications/general-conditions-of-recognition

⁴ www.gov.uk/government/consultations/withdrawing-qcf-regulatory-arrangements

framework would be that the size and level of all regulated qualifications are described in a consistent way. The proposed approach would provide a means to describe and compare the level and size of qualifications and identify possible progression routes between qualifications.

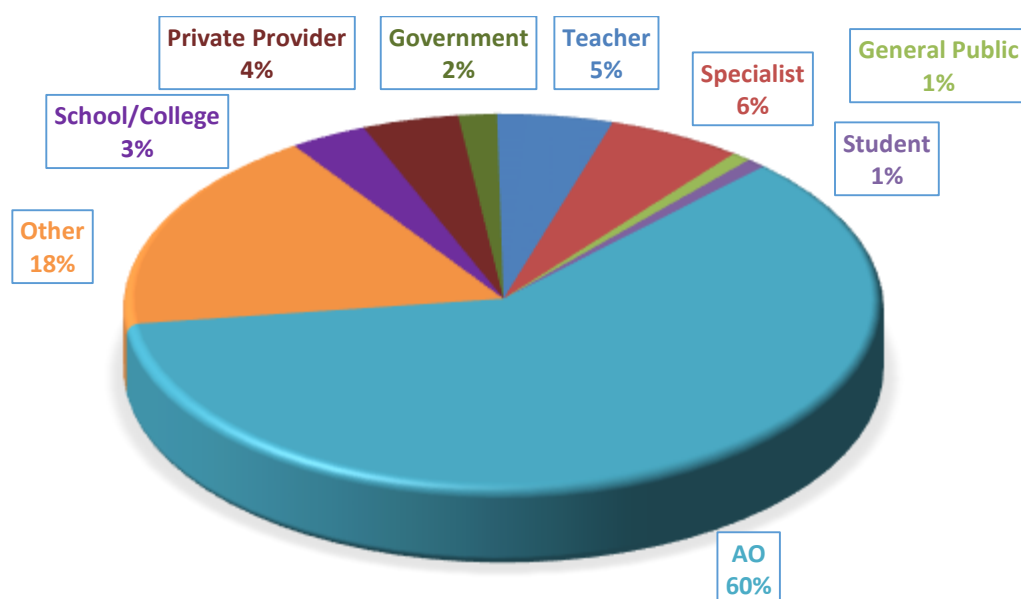
We published the consultation, which included 19 questions, on our website. Respondents could choose to respond using an online form (through surveygizmo), by email, or by posting their answers to us.

This consultation was designed to gather the views of those who wished to participate. Those who responded cannot be considered to be a representative sample of the general public or of any specific group.

Who responded?

We received a total of 119 responses to our consultation.⁵ Of these, 15 were from individuals expressing personal views and 104 were official responses from organisations or groups. The majority of responses were from individuals and organisations based in England (88.2 per cent).

Figure 1 Breakdown of consultation responses by respondent type



A list of the organisations that responded to the consultation is included in Appendix A.

⁵ Where responses were received in hard copy we entered them into the online platform. We entered 43 such responses manually.

Consultation analysis

We present here a statistical analysis and summary of key themes from the responses to the consultation questions, in the order in which they were asked in the consultation document.

Each of the consultation's 19 questions had a different focus. Respondents could choose to answer all or some of the questions.

It should be noted that a consultation is not the same as a survey and the responses only reflect the views of those who choose to respond. Typically these will be those with strong views and/or particular experience or interest in a topic. What follows is a fair reflection of the views expressed by respondents to the consultation.

Question 1

To what extent do you agree or disagree that awarding organisations should assign an appropriate level to their qualifications?

In all, 97.5 per cent of respondents strongly agreed or agreed that awarding organisations should assign an appropriate level to their qualifications.

Figure 2

	<i>Value</i>	<i>Percent</i>	<i>Count</i>
<i>Strongly agree</i>		83.9%	99
<i>Agree</i>		13.6%	16
<i>Disagree</i>		0.9%	1
<i>Strongly disagree</i>		0.9%	1
<i>Neither agree nor disagree</i>		0.9%	1
<i>Total</i>			118

"We believe that this a very important indicator to learners, employers and other stakeholders, and it makes it easier for users to identify and compare qualifications as well as providing clearer progression routes." (Awarding organisation)

Most common reasons why respondents strongly agreed/agreed

Of the respondents who strongly agreed or agreed:

- 61 per cent stated that the use of level is important to enable stakeholders to understand the relative demand of a qualification.

- 25 per cent suggested that allocating a level to a qualification is essential for structuring progression.
- 24 per cent felt it was essential for the comparison of different types of qualifications and for comparing qualifications across sectors.
- 23 per cent welcomed the intention that the proposed changes would not result in the need to recalibrate the levels currently assigned to their qualifications as that would have imposed an additional burden on their resources.

Some respondents also felt it would enable comparison with qualifications awarded in other countries by reference to different frameworks such as the European Qualifications Framework (EQF).

Most common reasons why respondents strongly disagreed/disagreed

A very small number of respondents to this question who strongly disagreed/disagreed (less than 1 per cent of those who responded) believed that awarding organisations would inflate the level of their qualifications and that there would never be parity of esteem between vocational and general qualifications if awarding organisations were allowed to assign a level to their own qualifications.

Question 2

To what extent do you agree or disagree that changing the level of a qualification would constitute a major change requiring an awarding organisation to notify us and others of the proposed change?

In all, 95.7 per cent of respondents strongly agreed or agreed that changing the level of a qualification would constitute a major change requiring an awarding organisation to notify us and others of the proposed change.

Figure 3

	<i>Value</i>	<i>Percent</i>	<i>Count</i>
<i>Strongly agree</i>		70.3%	83
<i>Agree</i>		25.4%	30
<i>Disagree</i>		1.7%	2
<i>Strongly disagree</i>		0.9%	1
<i>Neither agree nor disagree</i>		1.7%	2
<i>Total</i>			118

“If a qualification required a change in level then we are clear that it would then become a new qualification. If not and a new level was applied there would be an obvious impact on users of qualifications which could certainly be viewed as an adverse effect for those who had achieved the lower level. There would also be no comparability between different cohorts’ abilities with the same qualification.”
(Awarding organisation)

Most common reasons why respondents strongly agreed/agreed

Of the respondents who strongly agreed or agreed:

- 34 per cent felt that the level is such an important characteristic of the qualification that any change to it must be managed carefully and appropriately to mitigate against any adverse effects.
- 28 per cent suggested that changing the level of a qualification constituted a significant change and that we should be notified of such a change along with all other stakeholders.
- 24 per cent were of the view that changing the level of a qualification is so fundamental and constitutes such a major change that the qualification should be withdrawn and a new qualification introduced with the appropriate level assigned.
- 15 per cent believed that if we were not notified of a change to the level of a qualification there would be a danger that learners could be disadvantaged and confidence in the qualification system could be undermined.

Most common reasons why respondents strongly disagreed/disagreed

A very small percentage (2.6 per cent) of respondents disagreed or strongly disagreed. The main reasons for disagreeing were that assigning a level to a qualification should be part of an awarding organisation's standard quality assurance processes and they should not have to inform us of any change they wish to make to the level of the qualification.

Another reason was that changing a level would, in the view of these respondents, mean creating a new qualification, therefore awarding organisations should not have to tell us of any proposed changes they wish to make to a level, as they should be introducing a new qualification instead.

Question 3

To what extent do you agree or disagree that if an awarding organisation changes the level of a qualification it should be required to put in place, and comply with, a plan to protect the interests of learners?

In all, 94.1 per cent of respondents strongly agreed or agreed that if an awarding organisation changes the level of a qualification it should be required to put in place and comply with, a plan to protect the interests of learners.

Figure 4

	<i>Value</i>	<i>Percent</i>	<i>Count</i>
<i>Strongly agree</i>		71.2%	84
<i>Agree</i>		22.9%	27
<i>Disagree</i>		3.4%	4
<i>Strongly disagree</i>		0.9%	1
<i>Neither agree nor disagree</i>		1.7%	2
<i>Total</i>			118

Most common reasons why respondents strongly agree/agree

Of the respondents who strongly agreed or agreed:

- 40% felt that the interests of students who have already attained the qualification need to be protected. It was also stated that if the level of a

qualification is raised, the awarding organisation should ensure anyone who achieved the qualification on the lower level is not disadvantaged.

- 33% believed it was essential that the impact on users is assessed and that a plan is put in place to protect the interests of students.
- 14 per cent were of the view that given the potential impact of changing a qualification's level, a plan would provide more legal protection for an awarding organisation. 7.5 per cent believed it should not be possible to change the level of an existing qualification and that the qualification should be withdrawn and a new qualification offered with a different level.

Most common reason why respondents strongly disagreed/disagreed

A small percentage (less than 3 per cent) of all respondents who strongly disagreed/disagreed thought that this would add an additional layer of bureaucracy, therefore increasing the administrative burden.

Question 4

To what extent do you agree or disagree that if an awarding organisation changes the level of a qualification it should provide clear and accurate information about the change to all relevant users of the qualification?

Almost all (99.1 per cent) of the respondents agreed or strongly agreed that if an awarding organisation changes the level of a qualification it should provide clear and accurate information about the change to all users of the qualification.

Figure 5

	<i>Value</i>	<i>Percent</i>	<i>Count</i>
<i>Strongly agree</i>		70.3%	83
<i>Agree</i>		28.8%	34
<i>Disagree</i>		0.0%	0
<i>Strongly disagree</i>		0.0%	0
<i>Neither agree nor disagree</i>		0.9%	1
<i>Total</i>			118

Most common reasons why respondents strongly agreed/agreed

The majority of the respondents who strongly agreed or agreed thought that awarding organisations should provide clear and accurate information to all users of the qualification about its change of level. Respondents thought that a communication strategy should be developed as any change must be communicated and, in the interests of transparency, evidence produced to justify the change. They felt this would be essential to maintain confidence in the qualification system. Respondents also said that clear information should be provided which details how learners will be affected by the change and how they will be protected against any negative impacts.

A small percentage of this group also felt that there are a number of scenarios that could result in a change being made to a qualification's level. Although the provision of accurate information and clear communication is essential, they felt we should adopt a pragmatic approach to our requirements as communications should be appropriate to the context which necessitated the change.

Question 5

We propose to have level descriptors for two categories: knowledge and skills. To what extent do you agree or disagree with this proposal?

There was more divergence of opinion in respondents' answers to question 5 than the previous questions, with 62.7 per cent of respondents strongly agreeing or agreeing with our proposal in respect of the two categories of level descriptor and 25.4 per cent strongly disagreeing or disagreeing.

Figure 6

	<i>Value</i>	<i>Percent</i>	<i>Count</i>
<i>Strongly agree</i>		21.2%	25
<i>Agree</i>		41.5%	49
<i>Disagree</i>		21.2%	25
<i>Strongly disagree</i>		4.2%	5
<i>Neither agree nor disagree</i>		11.9%	14
<i>Total</i>			118

Most common reasons why respondents strongly agreed/agreed

Of the respondents who strongly agreed or agreed:

- 25 per cent thought that the level descriptors were clear and concise and that having level descriptors for two categories (knowledge and skills) would lead to a better understanding of what will be achieved through the attainment of the qualification.
- 18 per cent agreed that knowledge and skills are distinct elements and it made sense to describe the levels of attainment separately. Some respondents explained that they thought the distinction is important educationally and that it reinforces these elements in a qualification.
- 18 per cent felt that the approach would lead to a relatively simplified framework, which they would welcome.

Most common reasons why respondents strongly disagreed/disagreed

Of the respondents who strongly disagreed or disagreed:

- The majority stated that the loss of the autonomy and accountability category from the level descriptors would remove essential elements for the achievement of vocational competence. Some stated that these attributes are essential for distinguishing one level from another and their removal would make it difficult to effectively assign a level in the future. There was a view that this would be particularly detrimental to workplace qualifications.
- 11 per cent believed that autonomy and accountability should be retained as these are key elements of many national qualifications frameworks. Feedback included that removing these descriptors may make it more difficult to cross-reference with other frameworks particularly at the higher levels.
- Only 5 per cent felt that autonomy and accountability should be retained for use on an optional basis.

“The autonomy and accountability category is particularly useful and needed for distinguishing the level for work-based qualifications so should not be removed.”
(Awarding organisation Forum)

Question 6

Are there any other categories for which you think we should have descriptors?

There was almost an even split in respondents' answers to this questions with 50.4 per cent answering yes and 49.6 per cent answering no.

Figure 7

	<i>Value</i>	<i>Percent</i>	<i>Count</i>
<i>Yes</i>		50.4%	59
<i>No</i>		49.6%	58
<i>Total</i>			117

Most common reasons for answering yes

Where respondents answered yes, 22 per cent of this group suggested that descriptors for autonomy and accountability should be developed and made available for awarding organisations to use when relevant for the qualification. Other respondents suggested a category relating to work experience or employment skills and a category on competence, as some learners need to demonstrate competency, particularly if they are seeking industry accreditation.

A small percentage of respondents thought a separate category for 'understanding' should be added.

"Most people undertaking the qualification need to be able to demonstrate their competence (and have evidence of this) particularly if they are seeking industry accreditation of some kind." (Skills Forum)

Most common reasons for answering no

Where respondents answered no, the most common reasons related to avoiding complexity – with over 10 per cent of this group stating that knowledge and skills descriptors are sufficient and will help simplify the process for ascribing levels to a wide range of qualifications.

Other reasons included the belief that knowledge and skills are the most important and well understood elements and should be the only descriptors that are needed.

Question 7

To what extent do you agree or disagree that our proposed level descriptors reflect the requirements of a qualification at each level?

Responses to this questions showed that 78.6 per cent of respondents strongly agreed or agreed with this proposal, with 9.5 per cent disagreeing or disagreeing strongly.

Figure 8

	Value	Percent	Count
<i>Strongly agree</i>		14.5%	17
<i>Agree</i>		64.1%	75
<i>Disagree</i>		8.6%	10
<i>Strongly disagree</i>		0.9%	1
<i>Neither agree nor disagree</i>		12.0%	14
<i>Total</i>			117

Most common reasons why respondents strongly agreed/agreed

Of the respondents who strongly agreed or agreed with the proposal, 30 per cent thought that the descriptors were clear, unambiguous and appeared to contain a sufficient level of detail. The use of 'simple' and 'basic' was welcomed as it helped clarify the distinction between entry level and level 1.

The most common other reasons for agreeing with the proposals included the similarity of the descriptors to the current QCF descriptors; it was felt this would help their introduction as they would be consistent with the existing descriptors. This would mean a minimum amount of change was required which was welcomed.

Most common reasons why respondents strongly disagreed/disagreed

Where respondents strongly disagreed/disagreed with the proposals the reasons predominately related to concerns about the removal of the accountability and autonomy level descriptors which they said could make referencing against other frameworks, such as the European Qualifications Framework, difficult.

Also, some stated that the phrasing of the descriptors and the removal of accountability and autonomy would make it difficult to draw a clear distinction between levels. This would make it difficult to assign levels consistently. Three respondents in this category felt that the descriptors beyond level 3 were vague and imprecise and that more development work was required on the high level descriptors.

Question 8

Is there anything we could add to our proposed Requirements or guidance to help awarding organisations to use the level descriptors?

In all 61.2 per cent of respondents suggested that we could add to our proposed requirements or guidance to help awarding organisations use the level descriptors, with 38.8 per cent stating that we did not need to add anything.

Figure 9

	<i>Value</i>	<i>Percent</i>	<i>Count</i>
Yes		61.2%	71
No		38.8%	45
<i>Total</i>			116

Most common reasons for responding yes

The main reason why respondents stated that we should add to our proposed requirements or guidance to help awarding organisations to use the level descriptors was that the distinction between levels is often subtle and guidance on the key differentiators would be helpful.

Other views suggested that detailed guidance on how to apply the descriptors with sector specific examples would be helpful and would help ensure consistency in approach across awarding organisations.

Most common reasons for responding no

The main reason for respondents answering no was that they believed our requirements or guidance as drafted were helpful and clear, with the 'best fit approach' being pragmatic and helpful.

Also, some respondents said that a sufficient amount of detail was provided to enable awarding organisations to assign a level to a qualification without being overly prescriptive.

Question 9

We currently require qualification titles to include the level of the qualification. To what extent do you agree or disagree that we should retain this requirement?

89 per cent of respondents to this question either strongly agreed or agreed that we should continue to require the level of the qualification to be included in the

qualification's title, while 5 per cent of respondents strongly disagreed or disagreed that the level of a qualification should be included in the title of a qualification.

Figure 10

	Value	Percent	Count
<i>Strongly agree</i>		67.8%	80
<i>Agree</i>		21.2%	25
<i>Disagree</i>		2.5%	3
<i>Strongly disagree</i>		2.5%	3
<i>Neither agree nor disagree</i>		5.9%	7
<i>Total</i>			118

Most common reasons why respondents strongly agreed/agreed

Responses to this question showed that 89 per cent of respondents either strongly agreed or agreed that we should continue to require the level of the qualification to be included in the qualification's title.

Of those who strongly agreed or agreed:

- 58 per cent believed that including the level of a qualification in the title enables users to understand how demanding a qualification is.
- 12 per cent suggested that it was essential for comparability.
- 10 per cent felt that it is important for a title to indicate that the qualification is regulated and that to denote this, an acronym should be allowed, for example RQF (Regulated Qualifications Framework) as a bracketed addition to the title.

Other reasons stated for strongly agreeing or agreeing related to progression. It was suggested that including the level helps differentiate between qualifications and their relative levels of demand as other aspects of qualification titles are often quite similar.

“The level of a qualification is a critical indicator for learners, providers, employers, and other stakeholders of how demanding the qualification is.” (Awarding organisation)

Most common reasons why respondents strongly disagreed/disagreed

Only 5 per cent of respondents strongly disagreed or disagreed that the level of a qualification should be included in the title of a qualification. All of this group raised concerns about the potential for levels to mislead learners and cause confusion. Respondents also stated that levels were not necessarily relevant for professional qualifications. One respondent felt strongly that continuing to assign a level to a qualification would not help with parity of esteem between vocational and general qualifications.

Question 10

Do you have any comments about our proposed General Conditions?

About two-thirds (67 per cent) of respondents answered yes to this question and one-third (33 per cent) answered no.

Figure 11

	<i>Value</i>	<i>Percent</i>	<i>Count</i>
Yes		67.0%	77
No		33.0%	38
Total			115

Main comments

Where respondents answered no, the majority found the new General Conditions were clear and concise. Where respondents answered yes, the majority expressed concern over the apparent proliferation of General Conditions and complained that they were becoming unwieldy. There were calls for the General Conditions to be reviewed and rationalised as there was a risk of duplication.

Question 11

Do you have any comments about our proposed guidance?

Comments on the proposed guidance were received from 58.6 per cent of respondents with 41.4 per cent stating that they had no comments to make.

Figure 12

	Value	Percent	Count
Yes		58.6%	68
No		41.4%	48
<i>Total</i>			116

Main comments

Where respondents answered yes to this question, guidance was generally welcomed; however, it was thought that the guidance should not compensate for conditions that are not clearly drafted. Some said that if conditions were drafted in a more straightforward way, this would negate the need for more guidance. Others thought that the guidance enables a consistent interpretation of the General Conditions.

The guidance on 'levels' was thought to be clear and applicable to the full range of academic and vocational qualifications, with the draft guidance on Condition E10 (Recognition of Prior Learning) being particularly clear and helpful.

Question 12

To what extent do you think the draft RPA Criteria will help an awarding organisation determine whether a qualification is relevant for RPA purposes?

Just over half of respondents to this question (56 per cent) thought that the criteria were very helpful or helpful, while 14.6 per cent of respondents thought that the criteria were not helpful or very unhelpful, and 29.3 per cent of respondents said they had no opinion.

Figure 13

	Value	Percent	Count
<i>Very helpful</i>		4.3%	5
<i>Helpful</i>		51.7%	60
<i>Unhelpful</i>		10.3%	12
<i>Very unhelpful</i>		4.3%	5
<i>Don't know/no opinion</i>		29.3%	34
<i>Total</i>			116

Main reasons why respondents thought the draft criteria were very helpful/helpful

Generally those who responded that the criteria were very helpful or helpful were of the view that whilst being detailed and technical, the criteria were also clear and unambiguous.

Of those who thought that the criteria were helpful or very helpful:

- Around 25 per cent also thought that guidance should be provided on the type of evidence that we would expect to see in relation to each qualification to demonstrate that the awarding organisation has met its duties in respect of raising the participation age (RPA).
- 14 per cent stated that – although the criteria were helpful – further information should be provided that makes it clear to awarding organisations that they need to identify the specific qualifications that are relevant to RPA purposes and maintain records of those determinations.

Main reasons why respondent thought the draft criteria were unhelpful/very unhelpful

The respondents who thought that the criteria were very unhelpful/unhelpful, in the main were of the view that the criteria would add an unnecessary additional level of bureaucracy.

Other views included that the RPA criteria needed to be more succinct, and drafted so that they were clearer and easier to understand.

Concerns were raised that qualifications will have to have Total Qualification Time (TQT) applied to them regardless of their RPA status so it should not be necessary to identify RPA qualifications.

“We think that Ofqual needs to step back from this issue and re-consider a wide range of solutions, before it creates a highly bureaucratic, inefficient and ineffective system which results in even more confusion.” (Awarding organisation)

Question 13

How helpful do you think the draft TQT Criteria and guidance will be when awarding organisations calculate the values for a qualification’s Guided Learning, Directed Learning and Invigilated Assessment?

Responses to this question showed that 70.3 per cent of respondents thought that the TQT criteria and guidance were very helpful or helpful, while 26 per cent thought that the criteria and guidance were very unhelpful or unhelpful.

Figure 14

	Value	Percent	Count
<i>Very helpful</i>		11.0%	13
<i>Helpful</i>		59.3%	70
<i>Unhelpful</i>		14.4%	17
<i>Very unhelpful</i>		7.6%	9
<i>Don't know/no opinion</i>		7.6%	9
<i>Total</i>			118

Main reason why respondents thought the draft criteria and guidance were very helpful/helpful⁶

Of the respondents who thought that the draft criteria and guidance were very helpful/helpful, 22 per cent thought they were clear and easy to understand. The efforts to clarify what the components of TQT should include were welcomed and it was noted that TQT will be important for consistency and understanding qualification standard across all awarding organisations.

Main reasons why respondents thought the draft criteria and guidance were unhelpful/very unhelpful

Our proposals for defining TQT generated much comment. There was confusion about how the different teaching, learning and assessment activities should be classified. Many respondents suggested a simplified approach whereby only TQT and guided learning would be described.

“If plans for the implementation of TQT are to proceed then there seems to be general support for the suggestion that a 2 part approach (GLH plus other learning and assessment time) should be used as the basis for TQT in place of the proposed 3 part approach.” (Membership organisation)

⁶ Although 70.3 per cent of respondents entered very helpful or helpful on the survey for their response to this question, the majority of these respondents predicated their comments with the caveat that there was considerable concern amongst awarding organisations over the proposals for TQT. The negative comments contained in those responses have been captured under the unhelpful/very unhelpful section below, as they mirrored those of the respondents who had entered unhelpful or very unhelpful as their response.

Question 14

We originally proposed to describe: “The activity of a Learner in preparation, study or any other form of participation in education or training which takes place as directed by – but not under the Immediate Guidance or Supervision of – a lecturer, supervisor, tutor or other appropriate provider of education or training” as “Directed Study”. In response to feedback we are considering describing such activities as “Directed Learning”. Which of these descriptions would you prefer us to use?

Of those who responded to this question, 12.2 per cent preferred the description Directed Study with 87.8 per cent preferring Directed learning.

Figure 15

	<i>Value</i>	<i>Percent</i>	<i>Count</i>
<i>Directed Study</i>		12.2%	14
<i>Directed Learning</i>		87.8%	101
<i>Total</i>			115

Most common reasons for favouring Directed Study

Those who expressed a preference for Directed Study thought that it applied to a wider range of contexts than directed learning and that Directed Learning was too narrow a term.

Most common reasons for favouring Directed Learning

68 per cent of those who preferred Directed Learning suggesting that this was the more appropriate term as it was more inclusive.

In addition, it was thought that ‘learning’ was a term that could be applied to activities that supported vocational qualifications as well as general qualifications. Some felt that ‘study’ implied learning that was more classroom-based and academic in approach.

Question 15

We originally proposed to describe: “The participation of a Learner in the activity of being assessed for a qualification, where the assessment is subject to Invigilation but takes place without the benefit to the Learner of the Immediate Guidance or Supervision of a lecturer, supervisor, tutor or other appropriate provider of education or training” as “Dedicated Assessment”. In response to feedback we are considering describing such activities as “Invigilated Assessments”. Which of these terms would you prefer us to use?

Of those who responded to this question, 70.3 per cent preferred the term Invigilated Assessment with 29.7 per cent preferring the term Dedicated Assessment.

Figure 16

	<i>Value</i>	<i>Percent</i>	<i>Count</i>
<i>Dedicated Assessment</i>		29.7%	33
<i>Invigilated Assessment</i>		70.3%	78
<i>Total</i>			111

Most common reason for selecting Dedicated Assessment

Of the respondents who expressed a preference for Dedicated Assessment, the majority suggested that this is a much broader term which encompasses a wide range of assessment, whereas Invigilated Assessment implies exam-based assessment rather than the assessment of skills. It was thought that the term ‘invigilated’ did not reflect change to assessment or assessment practice as a result of new technology and that ‘Invigilated’ rather than ‘Dedicated’ could frustrate innovation. Concern was also expressed that qualifications with no invigilated assessment time (for example portfolio-based assessment) would be viewed by some stakeholders as being ‘easier’ to achieve than those with values assigned to this component of TQT.

Most common reason for selecting Invigilated Assessment

Of those who expressed a preference for Invigilated Assessment:

- 23.4 per cent found the term Dedicated Assessment was confusing. It was felt that the term ‘invigilated’ is widely understood.
- 18.7 per cent thought it was more appropriate for use in relation to vocational qualifications.

Respondents also thought that Dedicated Assessment was too vague and it was not clear what the term was conveying. Respondents said they thought the term Invigilated Assessment better conveys the type of activity that we intend to be included in this component of TQT.

Question 16

We have identified a number of ways in which our proposals may impact (positively or negatively) on persons who share a protected characteristic. Are there any other potential impacts we have not identified or any additional ways in which potential impacts could be mitigated?

Responses to this question showed that 13.6 per cent of respondents answered yes and 86.4 per cent answered no.

Figure 17

	<i>Value</i>	<i>Percent</i>	<i>Count</i>
Yes		13.6%	15
No		86.4%	95
<i>Total</i>			110

Other impacts identified

Where respondents to this question answered yes, their responses related to the proposals for TQT and to concerns that the proposed approach might make the system more difficult for persons who have certain protected characteristics to understand the qualification.

Question 17

Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?

Responses to this questions showed 12.6 per cent of respondents answering yes and 87.4 per cent answering no.

Figure 18

	<i>Value</i>	<i>Percent</i>	<i>Count</i>
Yes		12.6%	14
No		87.4%	97
<i>Total</i>			111

Additional steps identified

Where respondents answered yes to this question, it was suggested that we should abandon proposals that related to TQT or make the proposals less prescriptive. Respondents also stated that awarding organisations should be provided with guidance on what constitutes best practice.

Question 18

Have you any other comments on the impacts of the proposals in this document on persons who share a protected characteristic?

Only 6.3 per cent of respondents to this question answered yes with 93.8 per cent of respondents answering no.

Figure 19

	<i>Value</i>	<i>Percent</i>	<i>Count</i>
Yes		6.3%	7
No		93.8%	105
<i>Total</i>			112

Most common reason for responding yes

Where respondents answered yes they commented that consideration should be given to the impact on speakers of English as a foreign language, particularly with regard to the TQT proposals. Some respondents stated that guided learning hours and other measurements of qualification size are of significant interest to many overseas regulatory authorities and government agencies, and we will need to invest time and effort in explaining the new system to them. Feedback suggested that a transparent and 'plain English' approach to the terminology would reduce the impact for awarding organisations working internationally.

Question 19

Are there any potential regulatory impacts of the proposals in this document that we have not identified?

Of those who responded to this question, 57.5 per cent answered yes with 42.5 per cent responding no.

Figure 20

	<i>Value</i>	<i>Percent</i>	<i>Count</i>
Yes		57.5%	65
No		42.5%	48
<i>Total</i>			113

Most common reasons for responding yes

Of the respondents who answered yes to this question:

- 20.2 per cent expressed concern over the closure of the unit bank and the potential impact on awarding organisations. Particular concern was expressed around the uncertainties that had been created in relation to which awarding organisations would 'gift' their shared units to other awarding organisations who had already incorporated them into their qualifications. There were calls for us to have more of a 'policing' role in this regard. There was also concern that smaller awarding organisations could be seriously disadvantaged by the proposals. It was generally stated that it was essential to ensure that the closure of the unit bank was managed efficiently and systematically.
- 16.3 per cent thought that a requirement to remove the term 'QCF' from existing qualification titles by 31st December 2017 would be burdensome and confusing for users of the qualifications. It was thought that the term 'QCF' should be removed as and when the existing qualifications come up for review. Concern was expressed that there would be a considerable amount of work involved for awarding organisation to make the transition away from the QCF. Respondents said that clear timelines and deadlines needed to be provided so that the financial burden can be spread over time.

Some respondents also suggested that introducing the notion of a 'component' as part of a qualification would be unhelpful and needed more thought.

Respondents also raised the concern that many Ofqual-regulated awarding organisations also work in Wales, Northern Ireland and Scotland. They said it would be useful to have more information about how the withdrawal of the QCF and the

implementation of TQT will be approached by these regulators, especially the Welsh Government.

A number of those who answered yes to this question also welcomed the introduction of a new framework.

“The establishment of a single ‘meta-framework’ encompassing all regulated qualifications is undoubtedly to be welcomed, not least because it removes the artificial division of all qualifications into ‘general’ and ‘vocational’.” (Awarding organisation)

Appendix A: List of respondents to the consultation

When completing the questionnaire, respondents were asked to indicate whether they were responding as an individual or on behalf of an organisation.

Below we list those organisations that submitted a response to the consultation. We have not included a list of those responding as an individual. However, all responses were given equal status in the analysis.

AAT
ABC Awards
ABMA Education
ACCA
Access Training
Accredited Skills for Industry
Active IQ
AoC
AptEd
ASA
ASDAN
Aspire Group
Association of International Accountants
ATHE
BIFM
BIIAB
British Woodworking Federation
BSC
CACHE
Care Council for Wales
CELL
Centre for Interactive Education – CIE Global
Certsure
Chartered Institute for Securities & Investment
Chartered Institute of Building
Chartered Institute of Credit Management
Chartered Institute of Environmental Health
Chartered Institute of Housing
Chartered Institute of Procurement & Supply
Chartered Management Institute
Chartered Quality Institute
CIBTAC
CII

CILEx
CITB
City & Guilds
CLC
Clybiau Plant Cymru Kids' Clubs
Construction and the Built Environment Awarding Body Forum (BEABF)
Council for Dance Education and Training
CPCAB
Crossfields Institute
EAL
ECITB
Engineering Training Council Awards
Federation of Awarding Bodies (FAB)
Fire Industry Association
Future (Awards and Qualifications) Ltd
Gateway Qualifications
GQA Qualifications
Graded Qualifications Alliance (GQAL)
Green Inc
HABC
ifs University College
IMI Awards
Institute of Export
Institute of the Motor Industry
Inter Training Services
International Dance Teachers' Association
ISTD
JCQ
Landex
Lantra Awards
Laser Learning Awards
Lifetime Awarding
Medi Aid
Morley College
MPQC
National Federation of Roofing Contractors
NCC Education
NCFE
NFoPP
NISCC
NIACE
NOCN

Northumberland College
OAL Group
Open Awards
Open College Network NI
PAA\Q-SET
Pearson
Pensions Management Institute (PMI)
PIABC
Quality Assurance Agency for Higher Education (QAA)
Qualsafe Awards
RAD
Renewable Energy Skills Forum
Rockschool
Royal Horticultural Society (RHS)
Safety Training Awards (STA)
Scottish Credit and Qualifications Partnership (SCQFP)
Skills Funding Agency
SfC
SFJ Awards
Signature
SkillsActive and Habia
SQA
SSSC
SummitSkills
The Manchester College
Training Qualifications UK (TQUK)
Train Smart
Trinity College London
UAL
UKCES
Workers' Educational Association (WEA)
WJEC

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